

**Date: February 27, 2008**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**Re: EB Docket No. 06-36, Certification of CPNI Filing – Calendar Year 2007**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2007", as ordered in EB Docket No. 06-36.

**Company Name(s): Velocity Telephone, Inc.**

**Address: 4050 Olson Memorial Hwy, Suite 100 Golden Valley, MN 55422**

**Form Filer ID: 824646**

**Name & Title of Signatory: James A. Hickle, President**

I, James A. Hickle, certify that I am an officer of Velocity Telephone, Inc. and that based on my personal knowledge and acting as an agent for the Company, the Company has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

The Company has not taken any action (proceedings instituted or petitions filed by the Company at state commissions, the court system, or the FCC) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning unauthorized release of CPNI.

  
\_\_\_\_\_  
Company Officer

02/27/08  
Dated

Attachment

cc: Federal Communications Commission, Enforcement Bureau,  
Telecommunications Consumers Division,  
445 12<sup>th</sup> Street, SW, Washington, DC 20554

Best Copy and Printing, Inc.,  
445 12<sup>th</sup> Street, SW, Suite CY-B402, Washington, DC 20554

**Velocity Telephone, Inc. – Statement of CPNI Compliance**

Our company accesses and uses a customer's CPNI to market our own (or our affiliates') communication-related services (outside a customer's current relationship) only after the customer's Opt-Out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. Every two years our company (a) provides notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008, to each customer who has given Opt Out consent.

Our company maintains a record of our own and our affiliates' sales and marketing campaigns that use customer CPNI. We also do not disclose or provide CPNI to third parties, or allow third parties access to CPNI.

***CPNI Safeguards***

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Our company trains its personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place if the rules are violated up to and including immediate termination.

***CPNI Recordkeeping and Reporting***

Our company maintains records of our compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.

James A. Hickie, President  
Velocity Telephone, Inc.

**Velocity Telephone – Customer Proprietary Network Information (CPNI)**

Velocity Telephone is committed to protecting your personal information. Velocity Telephone will **NOT** share your information with any third party. Velocity Telephone assumes we have your consent to utilize your account information for marketing purposes of Velocity Telephone and its wholly owned affiliates products and services. Velocity Telephone gives its customers the opportunity to provide Opt-out approval at anytime by submitting an Opt-out approval request via email, recorded voicemail, fax or mail. This request maybe sent to:

**Email:** [opt-out@velocitytelephone.com](mailto:opt-out@velocitytelephone.com)

**Recorded Voicemail:** (763) 444-2424

**Fax:** (763) 444-2425

**Mail:** Velocity Telephone, Inc – CPNI Opt-out  
4050 Olson Memorial Hwy, Suite 100  
Golden Valley, MN 55422

Jim Hickle  
President  
Velocity Telephone, Inc.



"Solutions, Service and Savings - **FAST!**"

4050 Olson Memorial Highway • Suite 190 • Golden Valley, MN 55422

Ph: (763) 222-1000 • Fax: (763) 222-1001

[sales@velocitytelephone.com](mailto:sales@velocitytelephone.com) • [www.velocitytelephone.com](http://www.velocitytelephone.com)

Velocity Telephone, Inc. is a USFamily Company



Velocity Telephone –  
Customer Proprietary Network Information (CPNI)  
Employee Compliance Form

SAMPLE

Velocity Telephone is committed to protecting the personal information of all of our customers in compliance with the rules and procedures established by the Federal Communications Commission (FCC) concerning Customer Proprietary Network Information (CPNI) as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

As an employee of Velocity Telephone, Inc. or one of its affiliate companies, it is your responsibility to use all Customer Proprietary Network Information (CPNI) properly. As an employee you will **NOT** share this information with any third party, utilize the information for Marketing purposes, disclose, use, or disseminate any of Customer Proprietary Network Information (CPNI) to anyone without prior approval from the President of Velocity Telephone. Any violation of this policy is subject to a disciplinary process up to and including immediate termination.

Jim Hickie  
President  
Velocity Telephone, Inc.

**Employee Acknowledgement:**

Signature:

Printed Name:

JAMES A. HICKIE

Date:

02/28/08

**Velocity**  
TELEPHONE

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